TENNESSEE VALLEY AUTHORITY

CHATTANOOGA. TENNESSEE 37401

400 Chestnut Street Tower II

January 31, 1980

Director of Nuclear Reactor Regulation Attention: Mr. L. S. Rubenstein, Acting Chief Light Water Reactors Branch No. 4 Division of Project Management U.S. Nuclear Regulatory Commission Washington, DC 20555

Dear Mr. Rubenstein:

In the Matter of the Application of ) Docket Nos, 50-327 Tennessee Valley Authority ) 50-328

Enclosed for your information is TVA's position with respect to the short-term actions in item 1 of OIE Bulletin 79-06C.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

hi hies L. M. Mills, Manager

Nuclear Regulation and Safety

Enclosure

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### OIE BULLETIN 79-06C RESPONSE

### ITEM 1

# Short-Term Actions

- In the interim, until the design change required by the long-term action of this bulletin has been incorporated, institute the following actions at your facilities.
  - A. Upon reactor trip and initiation of HPI caused by low reactor coolant system pressure, immediately trip all operating RCP's.
  - B. Provide two licensed operators in the control room at all times during operation to accomplish this action and other immediate and followup actions required during such an occurrence. For facilities with dual control rooms, a total of three licensed operators in the dual control room at all times meets the requirements of this bulletin.

### Response to Part A

TVA is committed to trip the reactor coolant pumps at Sequoyah Nuclear Plant only after high head safety injection pump operation has been verified and the reactor coolant pressure has decreased below 1300 psig. This commitment is implemented in Sequoyah Nuclear Plant Emergency Operating Instruction (EOI) 1, 2, and 3. TVA's position is based on the recommendations that Westinghouse Electric Corporation has transmitted to us and the inductry through the PWR Owners Group.

## Response to Part B

The licensed shift crew in TVA plants consists of the following: (1) a shift supervisor who has an SRO license and who has overall responsibility for the plant when higher level "in-line" management personnel are not present, (2) an assistant shift supervisor (with an SKO license) for each unit who has supervisory responsibility for all normal, abnormal, and emergency activities on his assigned unit, and (3) a unit operator (with an RO license) for each unit. Additionally, TVA is committed to one more licensed reactor operator (RO) than the number of licensed units.

The assistant shift supervisor's normal work station is in the control room, but *t* periodically makes inspections of plant equipment. He will immediately go to the control room during emergency situations.

TVA believes that each shift is adequately manned and fully capable of taking all necessary action during any transient event; the addition of another licensed operator and the requirement that this operator remain in the control room at all times is not warranted.